REMARKS

Applicants reply to the Office Action dated November 2, 2007, within the shortened three month statutory period for reply. Claims 21-30 and 32-37 were pending in the application and the Examiner rejects claims 21-30 and 32-37 (Applicants assert that the Examiner inadvertently listed 1-39 in the summary and 21-30 and 32-29 in the rejection). Applicants cancel dependent claims 35 and 36 without prejudice in favor of filing one or more claims disclosing similar subject matter. Support for the amendments may be found in the originally-filed specification, claims, and figures. No new matter has been introduced by these amendments. Reconsideration of this application is respectfully requested.

Rejection under 35 U.S.C. § 102(e)

The Examiner rejects claims 21-30 and 32-39 under 35 U.S.C. § 102(e) as being anticipated by Shoham et al., U.S. Patent No. 6,584,451 B1 ("Shoham"). Applicants respectfully traverse this rejection.

In general, Shoman discloses a system for aggregating the buying power of individual buyers in order to obtain volume discounts on goods and services. The Shoman system includes a web interface to enable sellers to post products and services for sale, as well as an indication of a minimum low price they are willing to accept. Buyers interact with the system to indicate an interest in certain products and services along with an indication of a maximum price they are willing to pay. The Shoman system then finds the largest quantity at the smallest price for desired goods and determines if a deal can be completed between the sellers and buyers.

Shoman discloses systems that enable individual and/or groups of buyers to define a price at which they would be willing to pay for a particular good and/or service. According to Shoman, the offer to buy inherently includes two parameters; a purchase price and an item identifier. However, in a corporate purchasing environment, the purchaser can be defined in two dimensions; the corporation who is paying for the purchase, and the employee who is making the purchase decision. According to this scenario, it would be desirable to enable both entities to define rules for the purchase. For example, an employee may want to have the ability to define a preference for aisle seating for flight bookings. This type of preference would not likely be of concern to the corporation because the cost of an aisle seat is the same as any other seating arrangement within the same class. The corporation would likely choose to restrict the employee

from booking a flight with first-class accommodations because of the extra cost that the corporation would incur.

Moreover, the Shoman system is directed toward a centralized auction server similar to other known systems. **Shoman lacks the sophistication to connect to any number of Customer Reservations Systems (CRS) in order to retrieve itineraries for booked, but not ticketed, travel and compare rules corresponding to each of the itineraries.** To the contrary, users participate with the Shoman system by registering and participating with the centralized server alone. In other words, there is no need for Shoman to establish connections with external systems in order to collect data, because information pertaining to users of Shoman is collected and stored internally. Also, in the presently claimed invention, itinerary information is retrieved from a plurality of CRSs, but Shoman lacks the complex software, hardware, protocols, rules analysis and other features to perform an analysis on those itineraries based on sophisticated, multi-dimensional parameters such that similar itineraries can be grouped for the purpose of obtaining an optimum bid. Further, Shoman does not disclose automatically changing the provider of travel services based on an optimum bid. The Shoman system requires users to directly modify auctions that they are participating in. As such, Shoman does not disclose or contemplate the following elements, all within the context of travel reservations, such as that of the system that interacts with external CRSs to:

- compiling, at a travel reservations database, a first user profile based on first consumer rules defined by a first consumer, wherein said first consumer rules relate to departure time, arrival time, airport pair, class, and seating
- storing said first user profile in said reservations database
- compiling, at said travel reservations database, a first organization profile based on first organization rules defined by a first organization, wherein said first organization rules relate to departure time, arrival time, airport pair, class, and seating
- storing said first organization profile in said reservations database
- compiling, at a travel reservations database, a second user profile based on second consumer rules defined by a second consumer, wherein said second consumer rules relate to departure time, arrival time, airport pair, class, and seating
- storing said second user profile in said reservations database
- compiling, at said travel reservations database, a second organization profile based on second organization rules defined by a second organization, wherein said second organization rules relate to departure time, arrival time, airport pair, class, and seating
- storing said second organization profile in said reservations database
- establishing, via said travel reservations database, a network connection with a plurality of Customer Reservations Systems, wherein one of said plurality of Customer

Reservations Systems was used to book travel reservations to create a plurality of consumer itineraries

- analyzing, via said travel reservations database, said plurality of consumer itineraries stored at said plurality of Customer Reservations Systems to identify similar itineraries, wherein said similar itineraries include a similar departure time, similar arrival time, similar airport pair, similar class, and similar seating, and wherein said similar itineraries comprise reserved travel arrangements with a first vendor
- retrieving, at said travel reservations database, said first user profile and said first organization profile corresponding to a first itinerary, wherein said first itinerary is one of said similar itineraries
- retrieving, at said travel reservations database, said first user profile and said first organization profile corresponding to a second itinerary, wherein said second itinerary is one of said similar itineraries
- comparing, at said travel reservations database, said first consumer rules and said first organization rules relating to said first itinerary to said second consumer rules and said second organization rules relating to said second itinerary to determine when said first itinerary and said second itinerary match within a predefine threshold defined within said first consumer rules, said first organization rules, said second consumer rules, and said second organization rules
- grouping, at said travel reservations database, said first itinerary and said second itinerary to create a subset of consumer itineraries
- retrieving, from said travel reservations database, said subset of said consumer itineraries
- providing, via said travel reservations database, said subset of consumer itineraries to a vendor offering a travel service
- accepting, at said travel reservations database, a bid from said vendor to provide said travel service to said first consumer and said second consumer associated with said subset of said consumer itineraries based on an ability of said vendor to accommodate within said predefine threshold defined within said first consumer rules, said first organization rules, said second consumer rules, and said second organization rules
- verifying, at said travel reservations database, that said bid is in accordance with said said predefine threshold defined within said first consumer rules, said first organization rules, said second consumer rules, and said second organization rules
- confirming, at said travel reservations database, that said bid is an optimum bid; and,
- modifying a second subset of said subset of consumer itineraries to include said travel arrangements with a second different vendor according to said bid, wherein said second subset of consumer itineraries does not include said second different vendor

as similarly recited by independent claims 21 and 32.

Dependent claims 22-30 and 33, 34, and 37-39 variously depend from independent claims 21 and 32. As such, dependent claims 22-30 and 33, 34, and 37-39 are differentiated from the cited references for at least the reasons described above, as well as in view of their own respective features.

In view of the above remarks and amendments, Applicants respectfully submit that all pending claims properly set forth that which Applicants regard as their invention and are

allowable over the cited references. Accordingly, Applicants respectfully request allowance of the pending claims. The Examiner is invited to telephone the undersigned at the Examiner's convenience, if that would help further prosecution of the subject Application. Applicants authorize and respectfully request that any fees due be charged to Deposit Account No. 19-2814.

Respectfully submitted,

Dated: February 4, 2008

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